

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KNACK SYSTEMS, LLC)	
)	
Plaintiff/Counter-defendant,)	
)	
v.)	
)	Case No. 3:21-cv-07919
TECH DENALI, LLC)	
)	
Defendant/Counter-plaintiff.)	

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

July 27, 2022

Re: Knack Systems, LLC v. TechDenali, LLC
21-79219
Joint Letter Regarding Discovery Pursuant to Scheduling Order Dated May 18,
2022

Dear Judge Allen:

On May 18, 2022, this Court ordered the Parties to submit a joint letter on or before July 27, 2022, setting forth the status of completing discovery. Pursuant to the May 18, 2022 Order, the Parties submit this letter.

Rule 26 Disclosures

TechDenali LLC (“TechDenali”) submitted its Rule 26 Disclosures on November 3, 2021. Knack Systems, LLC (“Knack Systems”) did not object to TechDenali’s submission.

Knack Systems submitted its Rule 26 Disclosures on November 3, 2021. TechDenali objected to Knack Systems’ submission and sent Knack Systems a Rule 37 Letter on November 29, 2021. The Rule 37 Letter requested that Knack Systems substantiate its purported damages, in response to Knack Systems stating that “damages are difficult to quantify because they arise from Plaintiff’s loss of a client relationship due to Defendant’s conduct, but are believed to be

substantial.” Counsel for the parties met and conferred by phone regarding TechDenali’s Rule 37 Letter on December 2, 2021. As of the date of this submission, Knack Systems has not amended its Rule 26 Disclosures. However, on January 27, 2022, Knack Systems served TechDenali with a L. Civ. R. 8.1 statement of damages claimed, confirming that Knack Systems “seeks compensatory and consequential damages in an amount to be proven at trial, but believed to be in excess of \$300,000.00.”

Interrogatories, Requests for Production of Documents, and Requests for Admissions

On January 31, 2022, Tech Denali issued its First Set of Interrogatories and First Request for Production of Documents to Knack Systems. On February 11, 2022, Knack Systems issued its own First Set of Interrogatories and First Set of Document Demands.

TechDenali responded to Knack Systems’ interrogatories and first set of document demands on March 15, 2022. Knack Systems has not objected to TechDenali’s answers and responses.

On March 31, 2022, Knack Systems provided certain documents in response to TechDenali’s requests for production of documents. Knack Systems did not provide written responses or answers to Tech Denali’s Interrogatories or Document Requests.

The Parties engaged in a pretrial settlement conference on April 4, 2022, in which the Court advised that no additional discovery responses needed to be requested or provided until after a further pretrial settlement conference on May 17, 2022.

After the May 17, 2022 pretrial settlement conference, the Court extended the deadline for completion of fact discovery to October 3, 2022 and ordered the Parties to submit a joint letter setting forth the status of completing discovery by today’s date.

On July 1, 2022, TechDenali sent Knack Systems an additional Rule 37 Letter alleging that the documents Knack Systems previously produced are insufficient and fail to substantiate Knack System’s claimed damages, and requesting Knack Systems to provide written responses and answers to TechDenali’s Interrogatories and Requests for Production of Documents within two weeks. On the same date, TechDenali also issued its First Requests for Admission to Knack Systems, answers to which are due August 1, 2022. TechDenali additionally requested a formal response to its previous Rule 37 letter dated November 29, 2021.

As of the date of this submission, TechDenali has not received a response to either Rule 37 letter or written responses and answers to its discovery requests.

Outstanding Discovery Items

Therefore, pursuant to the May 18, 2022 Order, the Parties state that the following discovery items are outstanding as of the date of this letter:

1. Knack Systems' potential amendment of its Rule 26 Disclosures¹;
2. Knack Systems' written responses to TechDenali's First Set of Interrogatories;
3. Knack Systems' written responses to TechDenali's First Request for Production of Documents; and
4. Knack Systems' answers to TechDenali's First Requests for Admission, which are due on August 1, 2022.

Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I.W. Baker

Matthew I.W. Baker, Esq.
RAJAN & RAJAN LLP
494 Broad Street
Newark, New Jersey 07102
mbaker@genovaburns.com

Counsel for Plaintiff, Knack Systems LLC

By: 

Thomas A. Christensen
Pro hac vice
Alexandra N. Prejzner
Pro hac vice
HUCK BOUMA PC
1755 South Naperville Road, Suite 200
Wheaton, Illinois 60189
630 221-1755
tchristensen@huckbouma.com
aprejzner@huckbouma.com

By: /s/ Iram P. Valentin

Iram P. Valentin
New Jersey Attorney I.D. No. 010222002
KAUFMAN DOLOWICH VOLUCK
Court Plaza North 25 Main Street, Suite 500
Hackensack, New Jersey 07601
Telephone: (201) 708-8233
Facsimile: (201) 488-6652
ivalentin@kdvlaw.com

¹ TechDenali reserves the right to object to any new or amended disclosures as untimely. Additionally, it is TechDenali's position that the Court should set a date certain for any such new or amended disclosures.

Counsel for Defendant, Tech Denali, LLC

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